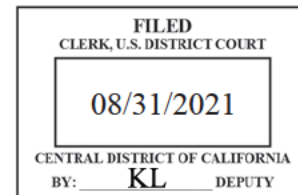


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12
13 **UNITED STATES DISTRICT COURT**
14 **CENTRAL DISTRICT OF CALIFORNIA**
15 **WESTERN DIVISION**

16 Case No. CV 11-05379-CJC (AGR_x)

17 MDL No. 2291

18 **CLASS ACTION**

19 IN RE CONAGRA FOODS, INC.

20 **ADDENDUM TO THE JUNE 25,**
21 **2013 STIPULATION AND**
22 **PROTECTIVE ORDER**
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1 Defendant Conagra Brands, Inc. (formerly ConAgra Foods, Inc., “Defendant,”
 2 or “Conagra”) submit this proposed Addendum To The June 25, 2013 Stipulation
 3 And Protective Order, as follows:

4 The parties to the above captioned action previously consented to a Stipulation
 5 and Protective Order (“Protective Order”) for the purpose of ensuring the
 6 confidentiality of certain Confidential Information. (ECF No. 163). The Court
 7 entered the Stipulation and Protective Order on June 25, 2013. At the time the
 8 Protective Order was entered, it did not contemplate Objector Todd Henderson
 9 (“Henderson”) or his counsel as designated “Qualified Person[s]” who could agree to
 10 be bound by the terms of the Protective Order. In light of the current procedural
 11 posture of the case, the parties hereby stipulate as follows:

- 12 1. If Objector Henderson and his counsel agree to be bound by the terms of
 13 the Protective Order, they are hereby designated as “Qualified
 14 Person[s]” pursuant to Paragraph 3 of the Protective Order.
- 15 2. Objector Henderson and his counsel shall not have access to any
 16 materials filed under seal or designated by any party as Confidential
 17 Information unless and until such time as they agree to be bound by the
 18 terms of the Protective Order.

19 Dated: August 9, 2021

Respectfully submitted,

20 /s/Angela M. Spivey

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CERTIFICATE OF SERVICE

I, Angela Spivey hereby certify that on August 9, 2021, I caused a true and correct copy of the foregoing [PROPOSED] ADDENDUM TO THE JUNE 25, 2013 STIPULATION AND PROTECTIVE ORDER to be filed and served electronically via the Court's CM/ECF system. Notice of this filing will be sent by e-mail to all parties by operation of the Court's electronic filing system or by mail to anyone unable to accept electronic filing as indicated on the Notice of Electronic Filing. Parties may access this filing through the Court's CM/ECF system.

/s/ Angela M. Spivey
Angela Spivey